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5/24/2018

Trident Anesthesia Group  
 Attn: Medical Records  
 9263 Medical Plaza, Ste B  
 Charleston, SC 29406

Re: Gloria Satterfield

Dear Records Custodian:

As you know, this office represents Michael Satterfield as PR for the Estate of Gloria Satterfield who requested her medical and billing records from your facility for 2/02/2018 to 2/26/2018. Our office recently received a bill from your facility in the amount of \$13.65 for payment of the records.

The Privacy Rule states that an individual has the right to access his/her PHI maintained by a covered entity in a designated record set for as long as the PHI is maintained in the designated record set (e.g., medical or billing records). See 45 C.F.R. § 164.524(a)(1). If an individual requests an electronic copy of that PHI, except under certain circumstances, a covered entity is required to provide the individual with such electronic copy to the extent it is readily producible. See 45 C.F.R. § 164.524(c)(2)(i) and (ii). A covered entity must act on the individual's request for access no later than 30 days after it receives the request. See 45 C.F.R. § 164.524(b)(2).

The Privacy Rule permits the covered entity to impose reasonable, cost-based fees to provide individuals (or their personal representatives) with access to their PHI. The fee may include only the cost of copying (including supplies and labor) and postage, if the patient requests that the copy be mailed. If the patient has agreed to receive a summary or explanation of his/her protected health information, the covered entity may also charge a fee for preparation of

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the summary or explanation. The fee may not include costs associated with searching for and retrieving the requested information. See 45 C.F.R. § 164.524(c)(4).

Additionally, if an individual's request for access directs the covered entity to transmit the copy of PHI directly to another person designated by the individual, the covered entity must provide the copy to the person designated by the individual. The individual's request must be in writing, signed by the individual, and clearly identify the designated person and where to send the copy of PHI. See 45 C.F.R. § 164.524(c)(3)(ii).

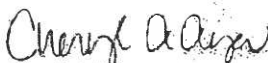
Please find enclosed a copy of the original request faxed on 5/07/218. Also, please find enclosed a copy of a letter from DHHS to the Swedish Health Services regarding similar violations and a letter regarding HITECH provisions allowing attorneys to receive low cost records. The regulations are enforced by the Department of Health and Human Services, Office of Civil Rights. Please call them to confirm this rule.

Accordingly, I would ask that you send my office an updated bill for the requested records in the amount of \$650.

Please do not hesitate to contact me if you should have any questions.

With kind regards, I am

Sincerely,



Cheryl A Ayer  
Office of R. Alexander Murdaugh

RAM/caa  
Enclosure